

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SONIA NOEMI SANTIAGO TORRES

DEBTOR

CASE NO. 15-08710/EAG

CHAPTER 13

**DEBTOR'S THIRD MOTION FOR EXTENSION OF TIME
TO REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 44**

TO THE HONORABLE COURT:

NOW COMES, SONIA NOEMI SANTIAGO TORRES, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On January 15, 2021, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 44, alleging that the Debtor has defaulted in her Plan payments in the sum of \$1,267.00.

2. On March 15, 2021 Debtor requested a second extension of time, Docket No. 48, of thirty days (30) to cure the arrears in the payment plan. Order due by April 14, 2021.

3. The Debtor hereby states that on April 16, 2021, she made a payment of \$420.00. Attached is evidence of money order no. 27101360610 (\$420.00). Although this new payment does not cover all the arrears the Debtor is in the process of obtaining the monies to cure the plan arrears.

4. The Debtor is still in arrears in the Plan payments (\$842.00) and the Debtor respectfully proposes to cure these arrears within thirty (30) additional days.

5. Based on the aforementioned, the Debtor respectfully requests an additional extension of time of thirty (30) days within to cure the balance owed on the Plan arrears

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Debtors' Motion for Extension of Time
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and inform the Court, accordingly. This extension of time to expire on May 16, 2021.

WHEREFORE, the Debtor, through her undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 16th day of April, 2021.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
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NOT NEGOTIABLE	Address	P.O. BOX 88109 Chicago IL	
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27101360610			

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Product	Qty	Unit Price	Price
Money Order			\$420.00
Serial#: 27101360610			\$1.30
Money Order Fee			\$421.30
Total			
US Flag #10 Env	1	\$0.69	\$0.69
Grand Total:			\$421.99
Debit Card Remitted			\$421.99
Card Name: VISA			
Account #: XXXXXXXXXXXX9315			
Approval #			
Transaction #: 045			
Receipt #: 055599			
Debit Card Purchase: \$421.99			
AID: A0000000980840		Chip	
AL: US DEBIT			
PIN: Verified		DEBITO ATH	

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